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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	RM-8143
Enhanced 911 Emergency)	
Calling Systems)	
)	
Guidelines for Waivers of)	DA 98-2631
Section 20.18(e) of the)	
Commission's Rules)	

COMMENTS OF TRITEL, INC.

Tritel, Inc. ("Tritel"), by its attorneys, respectfully submits these comments in response to the Wireless Telecommunications Bureau's December 24, 1998 *Notice* setting forth guidelines for requests for waivers of section 20.18(e) of the Commission's rules.^{1/} As a provider of wireless services, Tritel strongly supports the development of enhanced 911 services, including automatic location identification ("ALI") services. While Tritel is firmly committed to meeting the Commission's Phase II ALI requirement, Tritel has not yet determined what technology it will use to comply. Tritel believes that in light of the still formative state of ALI technology today, it is simply too early to commit to any one particular solution. Accordingly, Tritel urges the Commission not to take any action in response to the waiver requests that will preclude Tritel and other carriers from adopting the best possible Phase II ALI solution.

To meet the October 1, 2001 Phase II deadline, Tritel has committed to observing and conducting trials of ALI technologies in calendar year 1999 and selecting vendors and

^{1/} *Wireless Telecommunications Bureau Outlines Guidelines for Wireless E-911 Rule Waivers for Handset-Based Approaches to Phase II Automatic Location Identification Requirements*, Public Notice, DA 98-2631 (rel. Dec. 24, 1998) ("*Notice*").

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technologies as soon as possible thereafter. While this timetable should allow Tritel to meet the Commission's Phase II deadline, it may preclude Tritel from considering a handset-based solution because no such technology is currently available. Although Tritel believes that handset-based technology may be the best solution in the long run for many applications, Tritel would need a waiver of the October 1, 2001 deadline in order to investigate the feasibility of a handset-based approach.

To obtain a waiver, however, the Bureau has asked carriers to provide it with detailed information regarding the level of ALI accuracy and reliability the carrier plans to offer, the date the carrier will begin offering ALI-capable handsets to its customers, and the steps the carrier will take to minimize problems with non-ALI capable handsets and roamers. *Notice*, at 4. Because no nationally deployable, fully tested, cost effective handset-based technology currently exists, Tritel simply cannot provide the detailed information that the Bureau is requesting. Moreover, despite the claims of some equipment manufacturers to the contrary, there is currently no network-based solution available for carriers using Time Division Multiple Access ("TDMA") technology in their wireless networks, precluding Tritel from relying on a network-based solution as a back up.

Tritel does not believe that its situation is unique. While Tritel commends the Bureau for raising these issues well in advance of the Phase II deadline, Tritel is concerned that the Bureau unintentionally may force carriers to commit to an inferior technology in order to meet a rigid waiver deadline or standard. Because of the uncertain state of ALI technology today, the Bureau should adopt a flexible and technologically neutral framework for Phase II compliance that will allow Tritel and other carriers to make Phase II compliance decisions based on the benefits to

public safety and the performance and cost effectiveness of the technology, rather than arbitrary formulas and compliance dates.

I. IT IS PREMATURE TO COMMIT TO ANY ONE TECHNOLOGY

While the *Notice* focuses on handset-based technologies, the Bureau also asked that parties filing waiver requests and comments address any legal or other issues that might be raised by the grant of waivers. *Notice*, at 5. Tritel believes that the generally uncertain state of ALI technology is of crucial importance and should be considered by the Bureau when deciding whether and what type of relief to grant.

A. There Is No Network-Based Solution for TDMA Systems

Tritel currently uses digital IS-136 Time Division Multiple Access ("TDMA") technology in its wireless network. IS-136 TDMA is the wireless digital standard that allows Tritel to provide advanced wireless services such as caller ID, Internet e-mail capabilities, short messaging, paging, and advanced fraud protection features. All the reported tests and demonstrations of ALI technology, however, have involved analog wireless systems. Tritel is unaware of any existing ALI solutions, either network-based or handset-based, for TDMA systems.

Tritel has learned that at least one vendor plans to begin testing of a network-based ALI solution for TDMA systems later this year. This will be the first ever test of this technology to determine whether it will even work. Afterwards, issues will remain concerning whether any solution will meet the Commission's accuracy guidelines or negatively impact digital performance. While other new solutions such as a proposal to share a single ALI network among all competitors in a market are interesting, they will need to be tested in a real world environment. Moreover, as set forth above, the standards setting process for ALI network-based

solutions is not yet complete.^{2/} Any suggestion that a TDMA ALI solution is procurement-ready today is not supported by the facts.

If Tritel was forced to commit to a specific ALI solution immediately, it would have to choose among various network-based solutions because they are the only solutions that offer the potential for wide deployment in the near future. Because there is no network-based ALI solution currently available for TDMA systems, however, Tritel would need a waiver of section 20.18(e) if there was an immediate deadline. Fortunately, the ALI compliance deadline is over two years away and Tritel is hopeful that this situation will change in the next year.^{3/}

B. There Are No Handset-Based Solutions Currently Available

Even if a network-based ALI solution for TDMA systems becomes available within the next year, it does not necessarily mean that Tritel will adopt a network-based solution. Network-based solutions are extremely expensive. Equipment must be added to every cell site and implementing such a solution would be very burdensome from an operations standpoint. Compared to network-based solutions, Tritel believes that, in the long run, handset-based solutions will be less expensive and, more importantly, more accurate for certain applications.

^{2/} In addition, the Commission's accuracy standard itself may be subject to change in the near future. On November 25, 1998, the Wireless E9-1-1 Implementation Ad-Hoc ("WEIAD"), a group of wireless carriers, vendors, and public safety and consumer representatives, submitted an *ex parte* filing to the Commission recommending the following clarification to section 20.18(e): "Phase II location will be attempted on all 911 calls routed toward a Public Safety Answering Point ("PSAP") and will be accurate to within 125 meters in 67% of these calls." WEIAD's recommendation represents consensus by all parties and no oppositions have been submitted.

^{3/} If the situation does not improve within the next year or if other factors outside of Tritel's control develop that could prevent Tritel from complying with section 20.18(e), Tritel will notify the Bureau.

Despite rapid development, handset-based solutions are not yet ready for testing, much less deployment. Thus, there is currently no evidence that handset-based solutions will work in all environments. Moreover, as the Bureau is well aware, there are unresolved issues regarding roaming and legacy handsets. Tritel is also concerned that proposals to add ALI technology to handsets might be at odds with consumer preferences for smaller and less expensive handsets. While new proposals based on battery-module technology have the potential to make handset-based solutions more feasible, it likely will be impossible to complete development and testing and set standards in time to meet the Commission's deadline for Phase II.^{4/} While Tritel cannot provide the detailed information the Bureau has requested regarding implementation of a handset-based solution, to the extent the Bureau grants a general waiver or adopts a set of waiver options, Tritel asks to be included in such general relief.

II. THE BUREAU SHOULD ENSURE THAT CARRIERS HAVE THE FLEXIBILITY TO ADOPT THE BEST POSSIBLE PHASE II ALI SOLUTION

The Bureau should not do anything in this proceeding that would preclude carriers from using either a handset-based or network-based solution or place carriers at a competitive disadvantage if they choose one or the other or both. The issue is not network-based versus handset-based solutions. Instead, Tritel believes that the best solution may turn out to be a combination of the two technologies. Tritel urges the Bureau not to take any action in response to the waiver requests that will preclude or discourage Tritel from adopting the best possible Phase II ALI solution. Instead, the Bureau should adopt a flexible and technologically neutral framework for Phase II compliance that will allow Tritel and other carriers to make their Phase II

^{4/} As with any potential network-based solution, Tritel will have to conduct its own integration tests to ensure that any potential handset-based solution will not negatively impact digital performance.

technology decisions based on the benefits to public safety, and the performance and cost effectiveness of the technology.

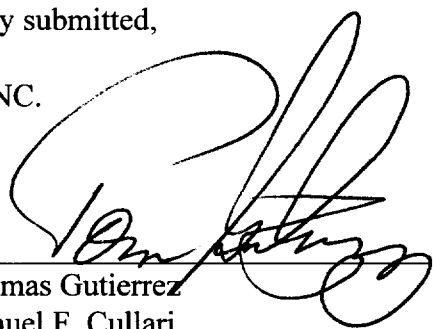
CONCLUSION

Tritel strongly supports the Commission's Phase II ALI requirements and is working hard to ensure that it meets the Phase II deadline. Tritel commends the Bureau for providing this opportunity for carriers to present information about obstacles to compliance with the Phase II ALI deadline. In the interest of providing consumers with the most reliable and cost effective solution, the Bureau should adopt relief that allows carriers to consider the widest possible range of technological solutions, including a handset-based solution.

Respectfully submitted,

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